

**Plaintiff
Jackie Fisher's**

**Response in Opposition
to Defendants'**

**Motion for
Summary
Judgment**

EXHIBIT

31

FY 05 and FY 06 Detail Turnover Report

Attached for your review is the FY 05 and FY 06 Turnover Report for CMC. The data in this report is sorted in descending order by the number of FTEs in the FY 06 "FTE COUNT" column heading. As you can see, CMC's aggregate turnover for FY 05 was 21.89% and roughly the same for FY 06 at 21.79%.

Please review this historical data and discuss it at your next local team meeting. While the CMC central office will continue to design and implement programs directed at lowering CMC's turnover rate, I encourage each facility to take a local, personal interest in becoming part of the turnover solution.

In August of 06 (the start of FY 07), UTMB and CMC moved to a new employee management system and as such, the data for the first quarter of FY 07 is not available at this time. I will instruct the HR and fiscal groups to continue to update turnover reports and make them available as soon as possible.

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OrgID	OrgName	FY 2005						FY 2006					
		FTE Count	Vol	Invol	Total	Vol	Invol	Total	FTE Count	Vol	Invol	Total	
9160012	GOREE UNIT	16.58	8.00	1.00	7.00	30.84%	0.11%	(35.74%)	18.25	4.00	1.00	5.00	21.8%
9160079	MOORE UNIT	18.58	8.00	1.00	6.00	0.00%	5.38%	(5.38%)	18.33	1.00	0.00	6.46%	0.00%
9160078	SEGOVIA UNIT	17.58	5.00	1.00	6.00	28.44%	5.88%	(34.12%)	18.75	0.00	0.00	6.46%	0.00%
9160102	COLE UNIT	17.78	4.50	0.00	4.50	25.30%	0.00%	(25.30%)	18.87	2.00	0.00	10.80%	0.00%
9160071	STEVENSON UNIT	20.33	2.00	0.00	2.00	9.80%	0.00%	(9.84%)	20.00	3.00	0.00	16.00%	0.00%
9160018	SCOTT UNIT	22.63	6.00	2.00	7.00	21.80%	8.78%	(30.88%)	20.58	2.00	1.00	3.00	9.72%
9160018	STRINGFELLOW UNIT	25.35	2.00	1.00	3.00	7.88%	3.85%	(11.84%)	21.67	4.00	0.00	4.00	16.48%
9160013	HUNTSVILLE UNIT	25.17	7.00	0.00	7.00	27.81%	0.00%	(27.81%)	22.83	5.00	1.00	6.00	21.80%
9160011	FERGUSON UNIT	22.42	6.00	3.00	9.00	28.77%	(35.88%)	(40.13%)	21.79	2.00	2.00	4.00	8.48%
9160005	CLEMENS UNIT	23.63	1.00	0.00	1.00	4.20%	0.00%	(4.20%)	24.42	2.00	0.00	2.00	8.41%
9162704	EMB-REGIONAL MEDICAL FACILITY	30.68	6.00	2.00	8.00	19.82%	6.64%	(26.19%)	24.83	7.00	1.00	8.00	8.19%
9160029	LUTHER UNIT	25.26	3.00	1.00	4.00	11.88%	9.88%	(15.84%)	25.08	2.00	1.00	3.00	26.19%
9160016	MOUNTAIN VIEW UNIT	25.58	5.00	2.00	7.00	19.54%	8.82%	(27.35%)	25.67	3.00	1.00	4.00	11.88%
9160051	BOYD UNIT	26.67	3.00	1.00	4.00	11.26%	3.75%	(26.07%)	26.87	5.00	2.00	8.00	23.19%
9160039	HOBBY UNIT	28.08	7.00	1.00	8.00	28.84%	8.83%	(30.87%)	26.92	6.00	2.00	8.00	7.73%
9160028	POWLEDGE UNIT	24.92	3.00	0.00	3.00	12.04%	0.00%	(12.04%)	24.42	1.00	0.00	2.00	23.16%
9160107	WOODMAN UNIT	28.00	5.00	2.00	7.00	17.88%	7.14%	(26.00%)	28.50	6.00	1.00	8.00	7.72%
9160009	EASTHAM UNIT	30.92	4.00	1.00	5.00	12.84%	3.23%	(16.77%)	26.75	8.00	6.00	13.00	28.81%
9160059	TDCJ PRIVATE-BRADSHAW	27.57	9.00	0.00	8.00	29.02%	0.00%	(28.02%)	27.01	7.80	2.00	9.80	28.88%
9160028	PACK I UNIT	26.78	6.00	0.00	6.00	21.30%	0.00%	(21.30%)	27.37	4.60	0.00	4.50	7.41%
9160075	HODGE UNIT	30.92	1.00	2.00	3.00	3.28%	8.47%	(9.70%)	28.33	2.00	1.00	3.00	30.87%
9167050	CORRECTIONAL MNGD H.C.-UTL REVIEW	61.28	8.00	5.00	14.00	17.66%	7.75%	(7.75%)	28.92	2.00	0.00	6.00	16.87%
9160027	TERRELL (ROSHARON) UNIT	31.00	7.00	1.00	8.00	22.58%	3.23%	(25.83%)	30.08	3.00	4.00	7.00	3.77%
9160058	TDCJ PRIVATE-DAWSON	31.00	0.00	2.00	2.00	0.00%	6.46%	(8.46%)	30.17	7.80	2.00	9.80	18.88%
9160010	ELLIS I UNIT	32.00	4.00	1.00	5.00	12.50%	3.13%	(15.83%)	30.25	11.00	2.00	13.00	18.44%
9160058	BYRD UNIT	33.26	1.00	1.00	2.00	1.01%	3.03%	(6.02%)	30.83	8.00	0.00	8.00	8.19%
9163154	EMB-DARRINGTON	35.75	5.00	1.00	6.00	13.08%	2.80%	(7.78%)	31.33	8.00	1.00	9.00	8.82%
9160058	DOMINGUEZ UNIT	32.75	6.00	2.00	8.00	16.32%	6.11%	(24.38%)	31.60	7.00	0.00	7.00	9.87%
9160017	RAMSEY UNIT	33.17	13.00	1.00	14.00	38.20%	3.02%	(42.21%)	31.58	7.00	0.00	7.00	13.30%
9184046	TRAVIS COUNTY UNIT	31.83	0.00	2.00	2.00	6.28%	0.00%	(8.28%)	30.17	14.00	5.00	19.00	46.41%
9160087	GIST UNIT	33.08	7.00	1.00	8.00	21.16%	3.02%	(21.16%)	32.33	2.00	0.00	2.00	8.19%
9160059	HUTCHINS STATE JAIL FACILITY	32.83	4.00	3.00	7.00	12.18%	9.14%	(21.78%)	33.50	10.00	0.00	10.00	28.86%
9160007	DARRINGTON UNIT	33.00	11.00	1.00	12.00	33.33%	3.03%	(38.38%)	34.17	7.00	0.00	7.00	25.53%
9160017	HOLIDAY UNIT	31.08	12.00	2.00	14.00	38.83%	6.23%	(45.04%)	34.42	9.00	2.00	11.00	22.22%
9160016	MURRAY UNIT	34.50	8.00	2.00	10.00	23.19%	5.80%	(28.98%)	34.58	8.00	3.00	11.00	22.18%
9160084	GURNEY UNIT	35.82	1.00	1.00	2.00	2.78%	2.78%	(2.78%)	35.50	8.00	0.00	8.00	8.19%
9160020	WAYNE UNIT	35.17	7.00	1.00	8.00	18.81%	2.84%	(22.76%)	35.42	0.00	0.00	0.00	28.86%
9160007	DARRINGTON UNIT	40.00	8.00	4.00	12.00	20.00%	10.00%	(30.00%)	40.83	7.00	1.00	8.00	20.49%
9160017	CORRECTIONAL MNGD H.C.-ADMINISTRATION	70.70	3.00	1.00	4.00	5.08%	4.25%	(9.34%)	41.42	2.00	0.00	4.00	20.49%
9160040	LEMS UNIT	44.00	10.00	1.00	11.00	22.73%	2.27%	(26.00%)	41.58	5.00	0.00	5.00	12.02%
9160071	PLANE UNIT	47.73	17.00	4.00	21.00	35.81%	8.38%	(43.89%)	44.75	8.00	2.00	8.00	5.67%
9160039	JESTER III UNIT	48.82	7.00	2.00	6.00	14.92%	4.26%	(19.16%)	49.42	2.00	1.00	3.00	5.85%
9160048	MCCONNELL UNIT	48.26	11.00	3.00	14.00	22.80%	6.22%	(26.02%)	50.04	7.00	1.00	8.00	5.34%
9160008	COFFIELD UNIT	53.23	8.00	1.00	9.00	16.03%	1.88%	(18.91%)	54.12	8.00	2.00	10.00	17.14%
9160054	POLINSKY UNIT	62.87	17.00	6.50	23.50	27.04%	16.34%	(37.35%)	55.50	9.00	4.00	13.00	14.78%
9160087	TELFORD UNIT	58.92	6.00	4.00	9.00	9.84%	7.03%	(16.87%)	68.52	11.00	2.00	13.00	24.58%
9160036	MICHAEL UNIT	57.97	10.00	1.00	11.00	17.34%	1.75%	(19.08%)	57.75	8.00	0.00	8.00	16.19%
9160068	CONNALLY UNIT	60.42	10.00	1.00	11.00	16.85%	1.68%	(18.21%)	58.25	12.00	1.00	13.00	13.98%
9160042	HUGHES UNIT	62.42	16.00	3.00	19.00	25.69%	4.81%	(30.44%)	60.68	22.00	3.00	25.00	20.60%
9160098	CENTRAL MEDICAL ADMINISTRATION	68.00	6.00	2.00	8.00	9.08%	3.03%	(12.12%)	61.98	3.00	1.00	4.00	4.84%
9160061	GARZA UNIT (CHASE FIELD)	88.50	4.00	3.00	7.00	6.02%	4.57%	(10.53%)	62.25	2.00	1.00	4.00	3.21%

FISHER-100433

Correctional Managed Care
Turnover Report
FY 05 and 06

OrgID	OrgName	FY 2005						FY 2006						
		FTE		Departments		Turnover		FTE		Departments		Turnover		
Count	Vol	Invol	Total	Vol	Invol	Total	Count	Vol	Invol	Total	Vol			
8210194	TYC-MC FADDEN RANCH	2.00	0.00	0.00	0.00%	0.00%	0.00%	0.58	2.00	0.00	2.00	342.88%	0.00%	
8160065	KEGAN UNIT	2.00	0.00	0.00	0.00%	0.00%	0.00%						342.88%	
9017007	HR CMC GATESVILLE	0.16	0.00	0.00	0.00%	0.00%	0.00%	2.00	0.00	0.00	0.00	0.00%	0.00%	
9017008	HR CMC BEVELLE	0.25	0.00	0.00	0.00%	0.00%	0.00%	3.00	0.00	0.00	0.00	0.00%	0.00%	
9017210	FEDERAL PRISON - SECURITY GUARDS	3.17	1.00	1.00	2.00	31.68%	31.68%	63.18%	3.00	0.00	0.00	0.00	0.00%	0.00%
6017001	HR CMC	6.33	0.00	0.00	0.00%	0.00%	0.00%	3.75	0.00	0.00	0.00	0.00%	0.00%	
9017006	HR CMC HUNTSVILLE	0.33	0.00	0.00	0.00%	0.00%	0.00%	3.92	0.00	0.00	0.00	0.00%	0.00%	
9161004	SOUTHERN REGION ADMINISTRATION	8.50	2.00	2.00	23.53%	0.00%	23.53%	4.00	0.00	0.00	0.00	0.00%	0.00%	
9017009	HR CMC SUGARLAND	0.33	0.00	0.00	0.00%	0.00%	0.00%	4.87	0.00	0.00	0.00	0.00%	0.00%	
9017006	HR CMC PALESTINE	0.33	0.00	0.00	0.00%	0.00%	0.00%	4.83	1.00	0.00	1.00	20.61%	0.00%	
9160016	VANCE UNIT	6.42	0.00	0.00	0.00%	0.00%	0.00%	4.83	1.00	0.00	1.00	20.61%	0.00%	
9160016	NEY UNIT	6.00	0.00	0.00	0.00%	0.00%	0.00%	5.33	3.00	0.00	3.00	66.23%	0.00%	
9160083	HENLEY UNIT	6.33	3.00	3.00	47.37%	0.00%	47.37%	6.83	2.00	0.00	2.00	34.23%	0.00%	
9160061	COTULLA	6.50	1.00	1.00	16.18%	0.00%	16.18%	5.83	1.00	0.00	1.00	17.14%	0.00%	
9160088	GLOSSBRENNER UNIT	3.50	0.00	0.00	0.00%	0.00%	0.00%	6.00	0.00	0.00	0.00	0.00%	0.00%	
9160021	ELLIS COUNTY JAIL	2.50	0.00	0.00	0.00%	0.00%	0.00%	6.12	2.00	1.00	3.00	32.85%	18.33%	
9160066	GOODMAN UNIT	6.76	2.00	2.00	26.93%	0.00%	26.93%	6.42	0.00	0.00	0.00	0.00%	48.98%	
9160083	DUNCAN UNIT	7.00	0.00	0.00	0.00%	0.00%	0.00%	6.87	1.00	0.00	1.00	16.00%	0.00%	
9210030	TYC-AL PRICE JUVENILE CORRECTIONAL FAC	11.75	3.00	3.00	0.00%	0.00%	0.00%	8.17	3.00	0.00	3.00	30.00%	31.26%	
9210080	TYC-EVANS REGIONAL JUVENILE CTR	9.17	3.00	3.00	32.73%	0.00%	32.73%	8.50	3.00	0.00	3.00	38.73%	38.73%	
9162004	EMS-CENTRAL ADMINISTRATION	9.83	1.00	2.00	10.17%	10.17%	20.34%	8.87	2.00	2.00	4.00	23.00%	35.20%	
9160043	CLEVELAND CORRECTIONAL CENTER	7.67	3.00	3.00	39.13%	0.00%	39.13%	8.75	1.00	0.00	1.00	11.43%	0.00%	
9160014	JESTER I UNIT	10.92	0.00	0.00	0.00%	0.00%	0.00%	9.00	3.00	1.00	4.00	33.33%	11.11%	
9160064	BRIDGEPORT	0.00	0.00	0.00	0.00%	0.00%	0.00%	9.12	2.50	2.00	4.50	27.40%	21.92%	
9160056	TDCJ PRIVATE-B-MOORE UNIT	8.17	1.00	2.00	3.00	12.24%	24.48%	38.73%	9.58	1.00	0.00	1.00	40.43%	0.00%
9160066	JOHNSTON UNIT	9.13	2.00	2.00	21.80%	0.00%	21.80%	9.80	0.00	0.00	0.00	0.00%	0.00%	
9210080	TYC-GAINESVILLE STATE SCHOOL	15.42	2.00	2.00	18.20%	0.00%	18.20%	8.83	6.00	2.00	7.00	50.83%	20.34%	
9160057	TDCJ PRIVATE-DIBOLL	9.58	1.00	1.00	10.43%	10.43%	20.87%	10.33	1.00	1.00	2.00	9.08%	9.08%	
9160084	HALBERT UNIT	11.17	4.00	4.00	35.82%	8.86%	44.78%	10.68	3.00	1.00	4.00	28.33%	8.45%	
9210100	TYC-SAN SABA STATE SCHOOL	10.83	1.00	1.00	9.23%	0.00%	9.23%	10.83	3.00	0.00	3.00	27.69%	0.00%	
9160023	KYLE	0.00	0.00	0.00	0.00%	0.00%	0.00%	10.82	1.00	0.00	1.00	0.16%	0.00%	
9160004	CENTRAL UNIT	14.60	2.00	2.00	13.78%	0.00%	13.78%	11.42	2.00	1.00	3.00	17.53%	8.78%	
9161204	EMS-COFFIELD	12.82	8.00	1.00	81.94%	7.74%	89.86%	11.42	4.00	1.00	5.00	35.00%	8.78%	
9210070	TYC-GIDDINGS STATE SCHOOL	11.87	2.00	2.00	17.14%	17.14%	34.28%	11.82	2.00	0.00	2.00	16.75%	0.00%	
9160103	LOPEZ UNIT	13.04	3.00	3.00	23.08%	0.00%	23.08%	12.67	0.00	0.00	0.00	0.00%	0.00%	
9160026	WILLACY STATE JAIL	13.03	4.00	4.00	37.50%	0.00%	37.50%	13.35	9.00	2.00	5.00	22.40%	14.98%	
9210040	TYC-CORSIGANA STATE HOME	13.25	4.00	5.00	9.00	30.18%	37.74%	67.92%	13.42	5.00	3.00	8.00	37.27%	22.38%
9160003	BRAZORIA COUNTY JAIL	11.42	0.00	1.00	0.00%	8.78%	8.78%	14.25	2.00	0.00	2.00	14.04%	0.00%	
9160037	ESTES CORRECTIONAL CENTER	13.58	7.00	8.00	61.53%	7.36%	58.90%	14.87	0.00	0.00	0.00	0.00%	0.00%	
9160055	TORRES UNIT	13.58	4.00	4.00	28.45%	0.00%	28.45%	14.75	1.00	0.00	1.00	8.78%	0.00%	
9210050	TYC-CROCKETT STATE SCHOOL	14.52	1.00	1.00	8.86%	0.00%	8.86%	14.83	1.00	0.00	1.00	8.74%	0.00%	
9210020	TYC-MARIN RECEPTION CENTER	15.42	1.00	2.00	6.48%	6.49%	12.91%	15.97	5.00	2.00	1.00	31.33%	6.51%	
9160048	HAMILTON	15.08	5.00	5.00	33.15%	0.00%	33.15%	16.00	2.00	1.00	3.00	20.00%	6.25%	
9160055	TYC-MCLENNAN STATE JUVENILE FACILITY	17.28	2.00	2.00	11.57%	0.00%	11.57%	16.18	3.00	0.00	3.00	29.53%	12.30%	
9160037	BARTLETT STATE JAIL	13.17	5.00	7.00	37.97%	15.18%	53.16%	15.58	8.00	0.00	8.00	38.50%	12.24%	
9160038	LINDSEY STATE JAIL	15.58	4.00	4.00	25.87%	0.00%	25.87%	15.75	3.00	1.00	4.00	19.05%	6.35%	
9160032	BRISCOE UNIT	18.10	4.00	9.00	24.84%	24.84%	49.68%	16.00	2.00	1.00	3.00	31.33%	6.51%	
9160048	HIGHTOWER UNIT	17.07	5.00	5.00	29.30%	0.00%	29.30%	16.27	4.80	2.00	6.80	20.00%	4.80%	
9160035	LOCKHART PRE RELEASE CENTER	18.17	1.50	1.50	9.28%	0.00%	9.28%	16.33	2.00	0.00	2.00	12.24%	0.00%	
9160031	HILLTOP UNIT	19.42	1.00	1.00	5.16%	0.00%	5.16%	18.58	4.00	0.00	4.00	24.12%	24.12%	
9160076	LE BLANC UNIT	18.25	1.00	6.00	30.77%	6.16%	38.92%	17.83	2.00	0.00	2.00	11.21%	0.00%	

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FY 05 and 06

Org#	OrgName	FY 2005				FY 2006				FY 2007					
		FTE Count	Vol Count	Separations Vol	Total Vol	FTE Count	Vol Count	Separations Vol	Total Vol	FTE Count	Vol Count	Separations Vol	Total Vol		
9160022	BETO I UNIT	73.75	10.00	3.00	13.00	13.56%	4.07%	17.63%	71.22	4.00	6.00	9.00	6.02%	7.02%	12.04%
9160024	GATESVILLE UNIT	73.92	13.00	1.00	14.00	17.59%	1.35%	16.84%	73.17	16.00	1.00	16.00	20.50%	1.37%	21.87%
9160049	STILES UNIT	78.17	9.00	8.00	15.00	11.37%	7.58%	18.95%	78.00	11.00	1.00	12.00	14.44%	1.32%	15.79%
9160086	SRMF/YOUNG MEDICAL FACILITY	80.55	6.00	4.80	13.80	11.17%	5.88%	17.13%	80.38	13.50	1.00	14.50	16.79%	1.24%	18.04%
9160033	JESTER IV UNIT	89.00	16.00	1.00	17.00	16.18%	1.01%	17.17%	85.68	12.00	1.00	13.00	12.65%	1.08%	13.60%
9160002	CENTRAL PHARMACY	91.30	9.00	1.00	10.00	9.88%	1.10%	10.95%	98.33	8.00	4.00	13.00	9.76%	4.07%	13.22%
9160034	SKYVIEW UNIT	106.78	23.76	6.00	28.76	22.24%	5.82%	27.61%	105.66	14.50	7.00	21.50	13.50%	6.85%	20.16%
9017200	FEDERAL PRISON - BEAUMONT	116.17	16.00	4.00	20.00	13.77%	3.44%	17.22%	114.82	22.00	1.00	23.00	19.14%	0.87%	20.01%
9160001	CRM/FESTELE UNIT	188.42	44.00	7.00	51.00	22.40%	3.56%	(25.97%)	(486.83)	40.00	12.00	52.00	21.41%	7.64%	27.83%
Total CMC Turnover		3234.56	565.85	142.39	708.15	17.48%	4.40%	21.88%	3152.76	544.00	131.00	675.60	17.27%	4.16%	21.43%